

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**IN RE: AQUEOUS FILM-FORMING  
FOAMS PRODUCTS LIABILITY  
LITIGATION**

MDL No. 2:18-mn-2873-RMG

**This Document relates to:**

*City of Stuart, FL, v. 3M Company et al.,  
No. 2:18-cv-03487*

**JOINT MOTION FOR CONTINUANCE**

Defendant 3M Company and the Plaintiff Leadership Committee hereby request a continuance of the trial of this case currently scheduled to begin June 5, 2023. In support of this motion, the Parties state as follows:

1. On October 26, 2022, the Court appointed the Hon. Layn R. Phillips (ret.) to serve as a Court-appointed mediator (“Mediator”) to assist the parties. The Court ordered that the Mediator facilitate and encourage discussions among and between the parties as he deems necessary and appropriate, and as he may be directed by the Court.
2. Since October 26, 2022, the Mediator has supervised mediation among outside counsel for 3M and Plaintiffs’ Co-Lead Counsel.
3. Plaintiffs’ Co-Lead Counsel and outside counsel for 3M have negotiated in good faith.
4. The parties are making material and significant progress toward a resolution and believe that their time would be more productively spent attempting to resolve the matter and therefore jointly request a continuance.

Dated: June 4, 2023

Respectfully submitted,

s/ Michael A. London  
Michael A. London  
Douglas and London PC  
59 Maiden Lane  
6th Floor  
New York, NY 10038  
(212)-566-7500  
[mlondon@douglasandlondon.com](mailto:mlondon@douglasandlondon.com)  
Paul J. Napoli

s/Brian C. Duffy  
Brian C. Duffy (Fed. ID. No. 9491)  
Duffy & Young LLC  
96 Broad Street  
Charleston, SC 29401  
(843) 720-2044  
[bduffy@duffyandyoung.com](mailto:bduffy@duffyandyoung.com)  
s/ Michael A. Olsen

Napoli Shkolnik PLLC  
1301 Avenue of The Americas  
10th Floor  
New York, NY 10019  
(212)-397-1000  
[pnapoli@napolilaw.com](mailto:pnapoli@napolilaw.com)

Scott Summy  
Baron & Budd, P.C.  
3102 Oak Lawn Avenue  
Suite 1100  
Dallas, TX 75219  
(214)-521-3605  
[ssummy@baronbudd.com](mailto:ssummy@baronbudd.com)

*Co-Lead Counsel for Plaintiffs*

Michael A. Olsen  
Daniel L. Ring  
Richard F. Bulger  
Mayer Brown LLP  
71 South Wacker Drive  
Chicago, IL 60606  
(312) 701-7120  
[molsen@mayerbrown.com](mailto:molsen@mayerbrown.com)

Beth A. Wilkinson  
Brian L. Stekloff  
Keri L. Arnold  
Tamarra Matthews Johnson  
Ralia Polechronis  
Hannah L. Bedard  
WILKINSON STEKLOFF LLP  
2001 M Street NW, 10thFloor  
Washington, DC 20036  
(202) 847-4000  
[bstekloff@wilkinsonstekloff.com](mailto:bstekloff@wilkinsonstekloff.com)

*Counsel for Defendant 3M Company*